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Attorneys for Defendant
Google Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE AUTHORS GUILD, INC., Associational
Plaintiff, BETTY MILES, JOSEPH
GOULDEN, and JIM BOUTON, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 05 CV 8136 (DC)

ECF Case

**DECLARATION OF BRUCE S. HARRIS
IN SUPPORT OF DEFENDANT GOOGLE INC.'S
MOTION FOR SUMMARY JUDGMENT**

I, Bruce S. Harris, declare as follows:

1. I have been employed in the publishing industry for more than 40 years, including work as marketing director for Crown Books, founder of the Harmony Books imprint, and President of Trade Sales and Marketing at Random House. I became a consultant in 2004 and have worked for both authors and publishers in that capacity.

2. I have been retained as an expert in this matter by Defendant Google Inc. to describe the custom and practice in the publishing industry with regard to how book content is used to promote sales.

3. My expert report, which was submitted in this matter on May 4, 2012, is attached hereto as Exhibit A. The facts in that report stated on my personal knowledge are true and correct. The report also states truly and correctly my opinions in this matter, based on the facts of which I have personal knowledge and the additional information reflected in the report.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 23, 2012 in New York, New York.



Bruce S. Harris